

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	§	CASE NO. 22-50946-MMP
	§	
LISA MARIE GARZA	§	
	§	
DEBTOR	§	CHAPTER 7 CASE

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**APPLICATION BY TRUSTEE AND LAW FIRM  
OF WHICH TRUSTEE IS A MEMBER TO ACT AS ATTORNEY FOR ESTATE**

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**This pleading requests relief which may be adverse to your interests.**

**If no timely response is filed within twenty-one (21) days from the date of service, the relief requested herein may be granted without a hearing being held.**

**A timely response is necessary for a hearing to be held.**

TO THE HONORABLE MICHAEL M. PARKER,  
UNITED STATES BANKRUPTCY JUDGE:

JOSE C. RODRIGUEZ, in his capacity as Trustee, (“Applicant”) submits this application (the “Application”) pursuant to 11 U.S.C. §§ 327 and 704 and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

1. The Debtor filed this case on August 27, 2022. Jose C. Rodriguez was appointed as the Chapter 7 Trustee and continues to serve in that capacity. This application is filed pursuant to 11 U.S.C. §§ 327 and 704 and Federal Rule of Bankruptcy Procedure 2014 and Local Rule 2014.

2. The Trustee moves for leave to act as the lawyer for the estate to assist the Trustee in the obtaining a court order ratifying a confidential compromise and settlement agreement that was negotiated between Debtor and National Debt Relief, LLC. Nathan Volheim was previously appointed as the attorney for the estate for services rendered in obtaining the Confidential

Settlement Agreement between the Debtor and National Debt Relief, LLC that is sought to be ratified by the services to be provided by Applicant.

3. The Court has jurisdiction over this matter pursuant to 11 U.S.C. § 327(d) which reads: “the court may authorize the Trustee to act as attorney or accountant for the estates if such authorization is in the best interest of the estates.”

4. There is cause to permit the Trustee to employ the firm of which he is a member and such employment is in the best interest of the estate because such employment will result in substantial cost savings, expedited administration and is warranted due to the Trustee’s firm’s existing administrative involvement.

5. Applicant is an attorney at law duly admitted to practice before this Court and other necessary state and federal courts in this jurisdiction and has a particular expertise with regard to bankruptcy and debtor/creditor matters in cases under the Bankruptcy Code.

6. The normal billing rates of applicant at the tie of this application is \$350.00 per hour. Legal Assistants will be billed at an hourly rate of \$95.00 an hour. It is contemplated that the law firm will seek compensation based upon normal and usual hourly billing rates. Applicant is informed and believes that the hourly rates of applicant’s law firm are reasonable in light of the current hourly rates charged by other attorneys in the San Antonio and Austin area.

WHEREFORE Applicant prays that the Law Office of Jose C. Rodriguez, which he is a member, be authorized to act as attorney for the estate with compensation for such legal services to be provided to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow upon application as filed by said attorney. Applicant prays for such other and further relief to which he may show himself justly entitled.

Dated: March 1, 2023

Respectfully submitted,

Law Offices of Jose C. Rodriguez  
1101 W. 34th St., #223  
Austin, TX 78705  
Tel: (210) 738-8881  
Fax: (210) 738-8882  
Email: jcrodlaw@gmail.com

By: /s/ Jose C. Rodriguez  
SBN: 17146450

**PROPOSED COUNSEL FOR  
CHAPTER 7 TRUSTEE**

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**CERTIFICATE OF SERVICE**

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I hereby certify that a true and correct copy of the foregoing document, along with a copy of the Proposed Order was filed with the Court and served electronically upon those Parties registered to receive electronic notice via the Court's CM/ECF system on the 1st day of March, 2023 or sent by United States First Class Mail within two business days to the Parties as set forth in the attached mailing matrix.

/s/ Jose C. Rodriguez

Label Matrix for local noticing  
0542-5  
Case 22-50946-mmp  
Western District of Texas  
San Antonio  
Wed Feb 1 10:33:15 CST 2023

U.S. BANKRUPTCY COURT  
615 E. HOUSTON STREET, ROOM 597  
SAN ANTONIO, TX 78205-2055

(p)ALLMAND LAW FIRM  
860 AIRPORT FREEWAY  
401  
HURST TX 76054-3264

Attorney General of Texas  
Bankruptcy Collection Division  
PO Box 12017  
Austin, TX 78711-2017

Bank of America  
Bankruptcy  
PO Box 660710  
Dallas, TX 75266-0710

(p)BARRETT DAFFIN FRAPPIER TURNER & ENGEL LL  
4004 BELT LINE ROAD SUITE 100  
ADDISON TX 75001-4320

(p)LINEBARGER GOGGAN BLAIR & SAMPSON LLP  
ATTN DON STECKER  
112 E PECAN  
SUITE 2200  
SAN ANTONIO TX 78205-1588

Bexar County Tax Assessor-Collector  
PO Box 839950  
San Antonio, TX 78283-3950

Cedar Hill National Bank  
C/O CATO  
PO Box 37902  
Charlotte, NC 28237-7902

Christus Santa Rosa Children's Hospital  
PO Box 847053  
Dallas, TX 75284-7053

Couch Lambert  
3501 N Causeway Blvd Suite 800  
Metairie, LA 70002-3625

Great Northwest Community Improvement Associ  
8809 Timberwilde St  
San Antonio, TX 78250-4331

Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 7346  
Philadelphia, PA 19101-7346

LVNV Funding, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Linebarger Goggan Blair & Sampson LLP  
Attn: Lisa Large Evans  
2777 N. Stemmons Freeway, Ste 1000  
Dallas, TX 75207-2328

Lisa Marie Garza  
9423 Valley Dale  
San Antonio, TX 78250-3901

Mariner Finance  
Attn: Bankruptcy 8211 Town Center Drive  
Nottingham, MD 21236-5904

Methodist Specialty & Redacted Hosp  
Resurgent Capital Services  
PO Box 1927  
Greenville, SC 29602-1927

NTTA  
PO Box 660244  
Dallas, TX 75266-0244

Resurgent Capital Services  
Attn: Bankruptcy  
PO Box 10497  
Greenville, SC 29603-0497

(p)SECURITY SERVICE FEDERAL CREDIT UNION  
ATTN ATTN PATRICK RYAN  
15000 IH 10 WEST  
SAN ANTONIO TX 78249-3531

Smile Direct Club HQ  
414 Union St 8th Fl  
Nashville, TN 37219-1929

Texas Alcoholic Beverage Comm  
Licenses and Permits Division  
PO Box 13127  
Austin, TX 78711-3127

US Attorney General  
US Department of Justice  
950 Pennsylvania Ave, NW  
Washington, DC 20530-0009

United States Attorney - Western  
601 NW Loop 410 Suite 600  
San Antonio, TX 78216-5597

United States Trustee - SA12  
US Trustee's Office  
615 E Houston, Suite 533  
San Antonio, TX 78295-1601

United States Trustee - Western  
615 E. Houston Street, Suite 533  
San Antonio, TX 78205-2055

Victoria Emergency Partners LLC  
PO Box 203949  
Dallas, TX 75320-3949

Jose C Rodriguez  
Jose C. Rodriguez, Trustee  
1101 W. 34th Street, #223  
Austin, TX 78705-1907

Nicholas C Inman  
Allmand Law  
860 Airport Freeway, Ste 401  
Hurst, TX 76054-3264

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Allmand Law Firm, PLLC  
Allmand Law Firm, PLLC  
860 Airport Fwy Ste 401  
Hurst, TX 76054-3264

Bank of America, N.A.  
c/o BDFTE LLP  
4004 Belt Line Rd, Ste 100  
Addison, TX 75001

Bexar County  
c/o Don Stecker  
112 E. Pecan Street, Suite 2200  
San Antonio, TX 78205

Security Service FCU  
Attn: Bankruptcy  
P.O. Box 691510  
San Antonio, TX 78269

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Lisa Marie Garza  
9423 Valley Dale  
San Antonio, TX 78250-3901

End of Label Matrix	
Mailable recipients	29
Bypassed recipients	1
Total	30